

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ELIZABETH GOMES, EVA M. CONNORS,
JENNIFER BOWEN, KATISHA
SHOULDERS, KENNETH N. MARENKA,
PAMELA PRISCO CARPENTER, STEVEN
PETERS, ZHANNA KARP, Individually, and
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

STATE STREET CORPORATION, STATE
STREET BANK & TRUST COMPANY,
NORTH AMERICA REGIONAL BENEFITS
COMMITTEE OF STATE STREET
CORPORATION, INVESTMENT
COMMITTEE OF STATE STREET
CORPORATION, and JANE and JOHN
DOES 1-20,

Defendants.

No. 1:21-cv-10863-MLW

**DECLARATION OF JAMIE L. FALGOUT IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR ATTORNEYS' FEES, ADMINISTRATIVE EXPENSES,
AND CASE CONTRIBUTION AWARD**

Pursuant to 28 U.S.C. § 1746, I, Jamie L. Falgout, declare as follows:

1. I am Of Counsel at the law firm of Peiffer Wolf Carr Kane Conway and Wise, ("Peiffer Wolf"), co-counsel to Class Counsel Scott & Scott in the above-captioned action (the "Action"). I submit this declaration in support of Class Counsel's motion for an award of attorneys' fees in connection with services rendered in the Action, as well as for reimbursement of litigation

expenses incurred in connection with the Action. I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

2. The schedule attached as **Exhibit 1** is a detailed summary showing the amount of time spent by attorneys of my firm who were involved in, and billed ten or more hours to, this Action, along with the lodestar calculation for those individuals based on the firms current billing rates. The hourly rates for the attorneys and professional support staff of my firm included in **Exhibit 1** are the same as the regular rates charged for their services in non-contingent matters and/or which have been accepted in other complex or class action litigation, subject to subsequent annual increases. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm.

3. Time expended on the application for attorneys' fees and reimbursement of litigation expenses has been excluded.

4. The total number of hours reflected in **Exhibit 1** is **244.4**. The total lodestar reflected in **Exhibit 1** is **\$163,845.00** for attorneys' time.

5. The firms' lodestar figures are based on the firms' billing rates, which rates do not include charges for expense items.

6. My firm has reviewed the time records that form the basis of this declaration to correct any billing errors.

7. Attached hereto as **Exhibit 2** is my firm's resume and brief biographies of all attorneys currently employed by my firm for whose work on this case fees are being sought. I declare, under penalty of perjury, that the foregoing facts are true and correct. Executed on June 20, 2024.

Jamie Falgout

Jamie L. Falgout